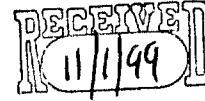




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October 26, 1999



The Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
200 C. Street S.W.
Washington, DC 20204

Dear Sir/Madam:

This is a notification pursuant to 21 U.S.C. 343(r)(6) that Standard Process Inc., Palmyra, Wisconsin 53156-0904, is making the following statements:

- (1) The zinc found in Zinc Liver Chelate plays a vital role in immune function, wound healing, and is integral in the functions of many organs and glands.
- (2) This product should be used only for the short-term restoration of zinc levels.

These statements are made for a dietary supplement containing a proprietary blend of bovine liver, carrot (root), beet (root), dried beet (root) juice, and oat flour. Other ingredients include zinc liver chelate, honey, arabic gum, and calcium stearate. And the name of the product is Zinc Liver Chelate.

The information contained herein is accurate and Standard Process Inc. has substantiation that the statements are truthful and not misleading.

Sincerely yours,

Ann Holden
Standard Process Inc.

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